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United States Attorney
District of Massachusetts

U.S. DISTRICT COURT
DISTRICT OF MASS.

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Federal Building & Courthouse
Main Street, Room 310
Springfield, Massachusetts 01103

May 9, 2005

Bernard T. O'Connor, Jr., Esq.
1391 Main Street
Springfield, MA 01103

Re: United States v. Ronald Charles
Criminal Nos. 05-30008-MAP; and 05-30009-MAP

Dear Attorney O'Connor:

In accordance with the government's discovery obligations pursuant to Local Rule 116.1(C) and 116.2(B) and Fed. R. Crim. P. 16(a)(1), I am providing you with the following response to your May 4, 2005 discovery letter.

1. Pursuant to Roviaro v. United States the government declines to produce discovery regarding any informants.
2. Pursuant to Roviaro v. United States the government declines to produce discovery regarding any informants.
3. Pursuant to Roviaro v. United States the government declines to produce discovery regarding any informants. The government refuses to disclose information regarding any other witness prior to the timing set forth in 18 U.S.C. § 3500.
4. The government will call state laboratory analyst Rebecca Pontes who will testify based upon her training and experience that the substance seized from the defendant was cocaine base. The government will also call as witnesses law enforcement agents assigned to the FBI's western Massachusetts gang task force who will testify based upon their training and experience that the substance seized from the defendant is cocaine base in the form of crack cocaine and the process of cooking crack cocaine.
5. The government refuses to provide witnesses statements at

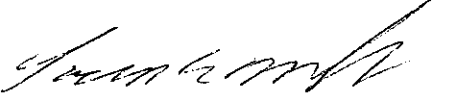
this time pursuant to 18 U.S.C. § 3500.

Please feel free to call me at (413) 785-0235 if you have any questions about the above information.

Very truly yours,

MICHAEL J. SULLIVAN
United States Attorney

By:


TODD E. NEWHOUSE
Assistant U.S. Attorney

Enclosures

cc: Bethany Healy,
Courtroom Clerk
Hon. Kenneth P. Neiman
United States Magistrate Judge
(w/o enclosures);